

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

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|--|---|------------------------------|
| IN RE: | * | CASE NO. 20-00633 EAG |
| EFRAIN CARRERO VELEZ | * | CHAPTER 7 |
| DEBTOR | * | |
| <hr style="width:40%; margin-left:0"/> | * | |

MOTION FOR EXTENSION OF TIME

TO THE HONORABLE COURT:

Now comes debtor, through the undersigned attorney and very respectfully prays and states as follows:

1. On December 13,2021 this Honorable Court entered an order directing debtor to state his position as to the trustee's reply to debtor's objection to final report(docket # 189).
2. This case involves the constitutional question of whether the trustee authority to pay a secured creditor with a lien on abandoned properties and whether this the bankruptcy court has jurisdiction to oppose the same. We have conducted a research on that matter, but have been unable to complete our response.

WHEREFORE, it is respectfully requested from this Honorable Court that debtor be granted 30 days, until January 24, 2022 to file our response.

CERTIFICATE OF SERVICE : I HEREBY CERTIFY: That on December 22, 2021 we electronically filed the foregoing using the CM/ECF system. Notice of this filing will be sent electronically though the CM/ECF System to Roberto Román, Chapter 7 Trustee, Noemi Landrau, Trustee, US Trustee.

In Mayaguez, Puerto Rico, this 22nd day of December, 2021.

/s/Alberto O. Lozada Colón

Alberto O. Lozada Colón

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